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Creditor

PAID

U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ
2019 MAR 11 A 10:10
JENNIFER A. DAUGHTON
CLERK

UNITED STATES DISTRICT COURT OF NEW JERSEY
BANKRUPTCY CLERK'S OFFICE

Creditor

Robert W. Champy and Gazzelle Champy

V

Debtor

Rita Ienco Plaza

ADVERSARY COMPLAINT

Case no. 18-34249-KCF

Judge: Honorable Judge Cathryn Ferguson

Adv. NO. 19-1115-KCF

Robert W. Champy and Gazzelle Champy assert that the debtor Rita Ienco Plaza is not entitled to receive a discharge of the debts to the creditor under the subdivisions 11 U.S.C.727-2(a) 4(c) 5

PARTIES

1. Creditor is a resident of the State of New Jersey
2. Debtor is a resident of the State of New Jersey

GENERAL ALLEGATIONS OF FACTS

- **727-2(a)** The debtor has held intent to hinder, delay, and defraud the creditor and has transferred, removed, concealed, and has permitted to be transferred, removed membership ownership in R & R Plaza LLC which is owner of commercial property located at 336-338 President St. Saddle Brook, NJ consisting of a mixed used commercial and 10 unit residential apartments.
- **727-4c** The debtor received, and obtain money, from the creditor with intentions of fraud pledging ownership in R & R Plaza LLC and additional assets as collateral
- **727-5** The debtor has failed to explain satisfactorily, any loss of assets or deficiency of assets to meet the debtor's liabilities, before determination of denial of discharge under this paragraph

OBJECTION OF DISCHARGE OF DEBT

The creditor asserts that the debtor is not entitled to discharge the debts by filing chapter 7 and obtain relief from **Judgement no. J 106688 18** filed from the creditor.

DATED this 8th day of March 2019

Robert W. Champy
100 Deer Horn Court
Upper Saddle River, NJ 07458
Creditor